

**TARTER KRINSKY & DROGIN LLP**  
*Substitute Special Litigation and Real Estate Counsel*  
*to Robert L. Geltzer as Chapter 7 Trustee*  
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UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK

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In re	:
	:
ESTELLA BRIZINOVA AND	:
EDWARD SOSHKIN,	:
	:
Debtors.	:
-----X	
ROBERT L. GELTZER, CHAPTER 7	:
TRUSTEE OF THE ESTATE OF	:
ESTELLA BRIZINOVA AND	:
EDWARD SOSHKIN,	:
	:
Plaintiff,	:
	:
- against -	:
	:
NICK SOSHKIN AND	:
IGOR SOSHKIN,	:
	:
Defendants.	:
-----X	

**TRUSTEE’S REPLY TO DEFENDANTS’ COUNTERCLAIM**

Plaintiff, Robert L. Geltzer, as chapter 7 trustee (the “Trustee” or “Plaintiff”) of the estate of Estella Brizinova and Edward Soshkin (the “Debtors”), by his substitute special litigation and real estate counsel, Tarter Krinsky & Drogin LLP, as and for his Reply to the Counterclaim of the defendants Nick Soshkin and Igor Soshkin (the “Defendants”) asserted in the Defendants’ Answer to Complaint (the “Answer”), alleges as follows:

1. To the extent the answers repeated, reiterated and realleged in paragraph 29 of the Answer are pertinent to the Defendants' Counterclaim, the Trustee denies those answers.
2. The Trustee denies the allegations contained in paragraph 30 of the Answer.
3. The Trustee denies the allegations contained in paragraph 31 of the Answer.
4. The Trustee denies the allegations contained in paragraph 32 of the Answer.

**AS AND FOR AN AFFIRMATIVE DEFENSE**

5. Defendants' Counterclaim fails to state a valid claim upon which relief can be granted.

WHEREFORE, the Trustee demands judgment against the Defendants:

- A. Granting the Trustee all of the relief sought in the Trustee's Complaint;
- B. Dismissing Defendants' Counterclaim with prejudice;
- C. Awarding the Trustee the reasonable costs and disbursements incurred in connection with this adversary proceeding; and

D. Granting the Trustee any additional relief that this Court deems just and equitable.

Dated: New York, New York  
May 1, 2014

**TARTER KRINSKY & DROGIN LLP**  
*Substitute Special Litigation and Real Estate  
Counsel to Robert L. Geltzer as  
Chapter 7 Trustee*

/s/ Robert A. Wolf  
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